

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

Jose A. Cruz-Kerkado, *et al.*
Plaintiffs
v.
Commonwealth of Puerto Rico, *et al.*
Defendants

CIVIL ACTION

Case No 3:16-cv-2748
Constitutional Rights

**MOTION FOR LEAVE TO FILE
SUPPLEMENTAL OPPOSITION**

To the Honorable Court:

COMES NOW, the Plaintiffs by and through the undersigned counsel and file this Motion for Court's Leave to file a Supplemental Opposition to dispositive motions (Dkt. #50 and Dkt. #48)

Plaintiffs humbly ask for Court's leave to file a brief *Supplemental Opposition* to Puerto Rico Shooting Association (Dkt. #50) and Commonwealth of Puerto Rico (Dkt. #48) dispositive motions.

Timely *oppositions* (Dkt. #55 and #56) were filed by due date March 29, 2017, to PRSA and Commonwealth's motions to dismiss, but defendant PRSA filed today March 30, 2017, its Answer to Amended Complaint. The PRSA defy Court Orders to gain advantage, as said response was deliberately not made available to the plaintiffs, prior to the filing deadline for our oppositions.

Careful review of said document reveal party admissions that support plaintiffs' arguments.

Attached to this motion, we enclosed Plaintiffs' Supplemental Opposition for Court's review.

WHEREFORE, for the reason set forth herein, plaintiffs respectfully move the Court for an Order accepting the attached Supplemental Opposition.

In San Juan, Puerto Rico, this 30th. Day of March 2017.

Respectfully submitted,

/S/ Humberto Cobo-Estrella, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2017, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that a copy of the foregoing pleading and the Notice of Electronic Filing has been served by ordinary U.S. mail upon all parties for whom counsel has not yet entered an appearance electronically.

/S/ Humberto Cobo-Estrella, Esq.
Attorney for the Plaintiffs